



Fw: Draft Permit Language for off-site waste and risk budget tool requirements

Dave Bartus to: Dennis Faulk

01/13/2012 04:30 PM

Dennis: Since Ron has proposed that these issues will be discussed at next weeks program manager (Rick Albright/Jane Hedges) conference call, and noted you were at a meeting where these issues were discussed, I was wondering if you had any information or knowledge from the meeting that would be useful for Rick, Andy Boyd and myself to be aware of before discussions involving my office.

Thanks, and I hope the new year is treating you well so far...

Dave

----- Forwarded by Dave Bartus/R10/USEPA/US on 01/13/2012 04:26 PM -----

From: "Skinnarland, Ron (ECY)" <RSKI461@ECY.WA.GOV>
To: Dave Bartus/R10/USEPA/US@EPA
Date: 01/13/2012 04:10 PM
Subject: FW: Draft Permit Language for off-site waste and risk budget tool requirements

Dave: FYI. We will mention these on our Wednesday call. Dennis Faulk was at the meeting.

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From: Skinnarland, Ron (ECY)
Sent: Friday, January 13, 2012 4:09 PM
To: Prignano, Andrea (ECY); Eberlein, Elis (ECY); Overton, Lee (ATG); Jaffe, Dori (ATG); Fitz, Andy (ATG)
Subject: FW: Draft Permit Language for off-site waste and risk budget tool requirements

FYI: Potential litigation issues with Hanford permit. These were discussed briefly at a standing meeting with Doug Shoop (USDOE-RL), Jane Hedges and Dennis Faulk (EPA Hanford office) and Stacy Charboneau (USDOE-ORP)

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From: Skinnarland, Ron (ECY)

Sent: Friday, January 13, 2012 3:54 PM

To: [Doug S Shoop@rl.gov](mailto:Doug_S_Shoop@rl.gov); Faulk, Dennis (EPA); Stacy Charboneau ([Stacy L Charboneau@orp.doe.gov](mailto:Stacy_L_Charboneau@orp.doe.gov))

Cc: Hedges, Jane (ECY); Whalen, Cheryl (ECY); Price, John (ECY); Dahl, Suzanne (ECY); (

[Lori A Huffman@rl.gov](mailto:Lori_A_Huffman@rl.gov))

Subject: Draft Permit Language for off-site waste and risk budget tool requirements

Doug et al: Here are examples of the off-site waste language and risk budget tool (performance assessment language) discussed at Thursday's coordination meeting.

We look forward to discussing this further with you and EPA.

Please forward to JD (I don't have his email address).

Thanks

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From: Eberlein, Elis (ECY)

Sent: Thursday, January 12, 2012 1:45 PM

To: Skinnarland, Ron (ECY)

Subject: offsite

DRAFT OFFSITE WASTE LANGUAGE

Definition language:

(In front section of permit)

The term "waste that is specifically identified in Section II, paragraph 8 of the Settlement Agreement re: Washington v. Bodman, Civil No. 2:30-cv-05018-AAM, January 6, 2006" means:

- a) Naval reactor compartments, reactor core barrels, reactor closure heads, and pumps from Puget Sound Naval Shipyard or Pearl Harbor Naval Shipyard that may contain LLW or MLLW;
- b) Demolition wastes from the Emergency Decontamination Facility at Kadlec Hospital in Richland;
- c) Materials resulting from DOE-related work at Battelle Pacific Northwest National Laboratory's facilities in Richland, Washington;
- d) Materials from treatability studies conducted off-site on waste samples from the Hanford Site's underground tanks;
- e) Samples of wastes from Hanford;
- f) Materials shipped from Hanford for off-site treatment and returned to Hanford for later disposition; and

g) Materials shipped from Hanford for off-site disposal, but returned to Hanford because the materials failed to meet Waste Acceptance Criteria or otherwise could not be disposed of at the intended disposal site.

Language in WRAP, CWC, T-Plant, and LLBG Trenches 31& 34 (in Conditions, Fact Sheet, and Add B of each of these units).

Permittees may store the following wastes approved for storage at the WRAP Operating Unit Group: dangerous or mixed waste that is generated from processes at the Hanford site, or waste that is specifically identified in Section II, paragraph 8 of the Settlement Agreement re: Washington v. Bodman, Civil No. 2:30-cv-05018-AAM, January 6, 2006. No other wastes may be stored at WRAP unless authorized via a permit modification decision pursuant to Permit Condition I.C.3. Requests for Permit modifications must be accompanied by an analysis adequate for Ecology to comply with SEPA.

DRAFT RISK BUDGET TOOL (PERFORMANCE ASSESSMENT) LANGUAGE

RISK Budget tool (from IDF permit)

1. Modeling – Risk Budget Tool
 - a. The Permittees must create and maintain a modeling - risk budget tool, which models the future impacts of the planned IDF waste forms including input from analysis performed as specified in Permit Condition III.11.C.7 [ILAW Waste Form Technical Requirements (IWTRD)] and their impact to underlying vadose and ground water. [[WAC 173 303 815](#)(2)(b)(i)]
 - b. This model will be submitted for Ecology review as soon as possible after issuance of Final Tank Closure and Waste Management EIS, and at least 180 days prior to the date the Permittees expect to receive waste at IDF but in no case later than July 2013 (or a later date if agreed to by Ecology).
 - c. The model will be updated at least every 5 years. The model will be updated more frequently if needed, to support Permit modifications or SEPA Threshold Determinations whenever a new waste stream or significant expansion is being proposed for the IDF.
 - d. This modeling-risk budget tool will be conducted in manner that is consistent with state and federal requirements, and represents a cumulative risk analysis of all waste previously disposed of in the entire IDF (both cell 1 and cell 2) and those wastes expected to be disposed of in the future for the entire IDF.
 - e. The groundwater impact should be modeled in a concentration basis and should be compared against various performance standards including but not limited to drinking water standards ([40 CFR 141](#) and [40 CFR 143](#)).
 - f. Ecology will review modeling assumptions, input parameters, and results and will provide comments to the Permittees. Ecology comments will be dispositioned through the Review Comment Record process and will be reflected in further modeling to modify the IDF ILAW waste acceptance as appropriate.
 - g. The modeling-risk budget tool will include a sensitivity analysis reflecting parameters, their uncertainties, and changes to parameters as requested by Ecology.
 - h. If these modeling efforts indicate results within 75 percent of a performance standard [including but not limited to federal drinking water standards ([40 CFR 141](#) and [40 CFR 143](#))], Ecology and the Permittees will meet to discuss mitigation measures or modified waste acceptance criteria for specific waste forms.
 - i. When considering all the waste forms to be disposed of in IDF, the Permittees will not dispose of any waste that will result (through forward looking modeling or in real groundwater concentrations data) in a violation of any state or federal regulatory limit, specifically including but not limited to drinking water standards for any constituent as defined in [40 CFR 141](#) and [40 CFR 143](#).

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